

1 VENABLE LLP
2 ARI N. ROTHMAN
3 Nevada Bar No. 15806
4 Email: anrothman@venable.com
5 600 Massachusetts Avenue, N.W.
6 Washington, D.C. 20001
7 Telephone: (202) 344-4000
8 Facsimile: (202) 344-8300

9 KAPLAN COTTNER
10 KORY L. KAPLAN
11 Nevada Bar No. 13164
12 Email: kory@kaplancottner.com
13 850 E. Bonneville Ave.
14 Las Vegas, Nevada 89101
15 Telephone: (702) 381-8888
16 Facsimile: (702) 382-1169

17 *Attorneys for Pixxles LTD*

18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IBUUMERANG, LLC, a Texas limited liability
company,

CASE NO. 2:21-cv-01611-JCM-VCF

Plaintiff,

vs.

**UNOPPOSED/CONSENT MOTION
REGARDING PIXXLES LTD.'S
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO
IBUUMERANG, LLC'S FIRST
AMENDED COMPLAINT [ECF No. 9]**

[Special Appearance Only]

17
18
19
20
21
22
23
24
25
26
27
28

T1 PAYMENTS LLC, a Nevada limited
liability company; T1 PAYMENTS
LIMITED, a United Kingdom private limited
company; TGLOBAL SERVICES LIMITED,
a United Kingdom private limited company;
DONALD KASDON, an individual; DEBRA
KAREN KING aka DEBRA KAREN
KASDON, an individual; AMBER
FAIRCHILD, an individual; PAYVISION
B.V., a Netherlands limited company; and
PIXXLES, Ltd., a United Kingdom private
limited company

Defendants.

KAPLAN COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 381-8888 Fax: (702) 382-1169

1 Having obtained plaintiff Ibuumerang, LLC's consent, specially-appearing defendant
2 Pixxles Ltd.¹ brings this motion to extend its time to answer or otherwise respond to the First
3 Amended Complaint (ECF No. 9, "FAC").

4 Ibuumerang filed its FAC on September 17, 2021, naming Pixxles as a defendant. Pixxles
5 is organized and exists under the laws of the United Kingdom. Pixxles received the lawsuit on
6 December 10, 2021.

7 Good cause exists to allow Pixxles to file its response to the FAC on or before
8 January 21, 2022, due to the intervening holidays and the schedules of counsel. Pixxles has not
9 requested prior extensions; this request is not made for purposes of undue delay; and there are no
10 pretrial or trial deadlines. Additionally, Ibuumerang consents to the requested extension.

11 THEREFORE, Pixxles Ltd. requests that this Court allow it to respond to the FAC on or
12 before January 21, 2022.

13 DATED: December 16, 2021

14 By: /s/ Kory L. Kaplan

15 **KAPLAN COTTNER**

16 Kory L. Kaplan, Esq.

17 **VENABLE LLP**

18 Ari N. Rothman, Esq.

19 *Counsel for Pixxles Ltd.*

20 IT IS SO ORDERED.

21 
22 Cam Ferenbach
23 United States Magistrate Judge

24 DATED 12-16-2021

25

26

27 ¹ Pixxles Ltd. files this motion through a special appearance because it contests that Nevada courts
28 may exercise personal jurisdiction over it. Thus, by filing this motion, Pixxles does not consent
to the personal jurisdiction of the Court or waive any defenses. Pixxles will move to dismiss
for lack of personal jurisdiction and any other available grounds under Rule 12.